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Attorneys for Defendants

CITY AND COUNTY OF SAN FRANCISCO,

HEATHER FONG, in her official capacity,

JOHN KESSOR, MICHELLE ALVIS and

PAUL MORGADO

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

KATHLEEN ESPINOSA, individually and as  
personal representative of the Estate of decedent  
ASA SULLIVAN; A.S., by and through his  
Guardian ad Litem, NICOLE GUERRA;

Plaintiffs,

vs.

CITY AND COUNTY OF SAN FRANCISCO,  
a municipal corporation; HEATHER FONG, in  
her capacity as Chief of Police for the CITY  
AND COUNTY OF SAN FRANCISCO; JOHN  
KEESOR, individually, and in his capacity as a  
police officer for the CITY AND COUNTY OF  
SAN FRANCISCO; MICHELLE ALVIS,

Case No. C 06 04686 JSW

**STIPULATION TO EXTEND MEDIATION  
DEADLINE**

1 individually and in her capacity as a police  
 2 officer for the CITY AND COUNTY OF SAN  
 3 FRANCISCO; PAUL MORGADO, individually  
 4 and in his capacity as a police officer for the  
 5 CITY AND COUNTY OF SAN FRANCISCO;  
 6 and, San Francisco police officers DOES 1-25,  
 7 inclusive,

8 Defendants.

### 9 STIPULATION

10 On April 20, 2007, counsel for the parties met and conferred regarding the mediation  
 11 scheduled in this matter to take place on April, 25, 2007. With the agreement of counsel for the  
 12 defendants, Blake Loebs, Plaintiff's counsel contacted the court-appointed mediator in the above-  
 13 entitled action, Howard Janssen, Esq., to request that the date of the mediation be extended for up to  
 14 five months, to allow substantial discovery to take place. Counsel agreed that there could be no  
 15 significant efforts to resolve this matter without conducting significant discovery. Mr. Janssen  
 16 agreed to continue as the court-appointed mediator in the expectation that the parties will participate  
 17 in the mediation within a period of five months from the deadline initially set by the Court to  
 18 complete mediation in this matter.

19 Based on the foregoing, the parties jointly request that the deadline for ADR in this matter be  
 20 extended from May 7, 2007 to October 8, 2007.

### 21 SO STIPULATED.

22 Dated: April 23, 2007

**The Law Offices of John L. Burris**

23 \_\_\_\_\_/s/\_\_\_\_\_  
 24 Ben Nisenbaum, Esq.  
 25 Attorney for Plaintiffs

26 Dated: April 23, 2007

**Dennis J. Herrera, City Attorney**  
**Joanne Hoepper, Chief Trial Attorney**  
**Blake P. Loebs, Deputy City Attorney**

27 \_\_\_\_\_/s/\_\_\_\_\_  
 28 Blake P. Loebs,  
 Attorney for Defendants

**(~~PROPOSED~~) ORDER**

Good cause shown, based on the representation of counsel for the parties in their joint stipulation, the Court hereby grants the parties' stipulation and orders that the deadline to complete ADR through the Court-appointed mediation process in this matter be extended to October 8, 2007.

**IT IS SO ORDERED.**

Dated: April 25, 2007

  
UNITED STATES DISTRICT COURT JUDGE